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UNITED STATES OF AMERICA, ) CASE NO. 18-CR-00465 MMC  
Plaintiff, ) STIPULATIONS RE: CERTAIN DEVICES  
v. )  
FUJIAN JINHUA INTEGRATED CIRCUIT ) The Honorable Maxine M. Chesney  
CO., LTD, ) Trial: February 28, 2022, at 9:00 am  
Defendant. ) Courtroom 7, 19<sup>th</sup> Floor

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## FACTUAL STIPULATIONS

The parties hereby stipulate, for purposes of the trial of this action, that the following facts are conclusively established and are not in dispute:

1. On February 7, 2017, Ministry of Justice Investigation Bureau (“MJIB”) special agents seized a portable hard drive, HDD Model: WDC\_WD6400BEVT-22A0RT0, serial number WD-WXR1EB0YVJ30, at Kenny Wang’s residence in Taiwan.
2. On February 7, 2017, MJIB special agents seized an ACER brand laptop, HDD Model: WDC\_WD2500BEVT-00A23T0, hard drive serial number WD-WXL1A61D6393, at Kenny Wang’s residence in Taiwan.
3. On February 8, 2017, J.T. Ho voluntarily turned over to MJIB special agents a portable hard drive, Model: ST1000LM024\_HN-M101MBB, serial number 755912FD9J813S, that J.T. Ho obtained at his residence in Taiwan.
4. On February 9, 2017, Taiwanese law enforcement obtained a HP brand laptop, HDD Model: TOSHIBA\_MK5061GSYN, hard drive serial number 32J5FRTWS, label UMC030761.
5. On February 9, 2017, Taiwanese law enforcement obtained a flash drive, Model: USB 3.0 FD, serial number 340373E9817A4117B03132FD0F7679.
6. On February 9, 2017, Taiwanese law enforcement obtained a flash drive, Model: DataTraveler 2.0, serial number 1C6F654E59A2FDB159042.
7. On February 14, 2017, MJIB special agents seized a hard drive, HDD Model: HitachiHTS545050A7E380, serial number TA9511GZHEDS1S, at L.T. Rong’s UMC office in Taiwan.
8. On February 14, 2017, MJIB special agents seized an ACER brand UMC laptop, Model: KINGSTON\_RBU-SC100S37240GE, hard drive serial number 50026B72480D77FB, at L.T. Rong’s UMC office in Taiwan.

9. On February 14, 2017, MJIB special agents seized a flash drive, Model: Transcend 32GB, serial number AA0000000000489, at L.T. Rong's UMC office in Taiwan.

The undersigned parties agree and stipulate to the foregoing facts.

## **TRIAL STIPULATIONS**

The parties hereby stipulate, for purposes of the trial of this action, that:

1. Jinhua will not object to the relevance of the devices identified in Paragraphs 4, 5 and 6, above. Jinhua, however, reserves the right to argue that the forensic images obtained from those devices are not authentic or admissible, including based upon the arguments made in Jinhua's Motion in Limine, Dkt. 247.

The undersigned parties agree and stipulate to the foregoing.

Dated: February 27, 2022

Respectfully Submitted,

STEPHANIE M. HINDS  
United States Attorney

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*/s/*

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Dated: February 27, 2022

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/s/  
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